

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Service Rules for Advanced Wireless)	WT Docket No. 07-195
Services in the 2155-2175 MHz Band)	
)	
Service Rules for Advanced Wireless)	WT Docket No. 04-356
Services in the 1915-1920 MHz, 1995-2000)	
MHz, 2020-2025 MHz, and 2175-2180 MHz)	
Bands)	

COMMENTS OF PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION

PCIA—The Wireless Infrastructure Association¹ (“PCIA”) respectfully submits its comments in the above-captioned docket to support the request of T-Mobile USA, Inc. (“T-Mobile”) for an extension of the date for filing comments in this proceeding. As T-Mobile indicated in its comments, an extension of the date for filing comments in this proceeding to 90 days (or October 7, 2008) would afford the Commission and interested parties an opportunity to institute and analyze testing of the interference issues raised by T-Mobile and other parties.² Alternatively, if the Commission will not institute its own tests, an extension of the comment date by at least 30 days would allow T-Mobile to submit its own analysis of the

¹ PCIA is a non-profit trade association representing wireless infrastructure providers. PCIA’s members own, operate and manage over 115,000 wireless facilities nationwide, and include wireless carriers, tower companies and professional services.

² See T-Mobile Request for Extension of Time to File Comments, WT Docket No. 07-195 and 04-356, at 1 (filed July 1, 2008).

interference issues raised in this proceeding, and would allow other parties to review this analysis.³

We submit that an extension of the date for filing comments in this proceeding to 90 days furthers at least two primary Commission goals: that of effective use of spectrum already licensed, and that of ensuring the efficiency and success of spectrum yet to be auctioned.⁴

The interference issues raised in this proceeding merit careful review through a comment period affording sufficient time for stakeholders to share data and analyses. PCIA respectfully requests that the Commission extend the filing date for this proceeding.

Respectfully submitted,

PCIA—THE WIRELESS INFRASTRUCTURE

ASSOCIATION

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July 3, 2008

³ *See id.*

⁴ *See id.* at 8.